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10 *Attorneys for Defendant Early Warning Services, LLC*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Thomas Pamplona,

14 Civil No. 2:19-cv-01000

15 Plaintiff,

16 v.
17 **STIPULATION TO EXTEND TIME**
18 **TO FILE RESPONSIVE PLEADING**
19 **(First Request)**

20 Early Warning Services, LLC,

21 Defendant.

22 Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Thomas Pamplona, by
23 counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time to File
24 Responsive Pleading up to and including July 30, 2019. In support of the Stipulation, the parties state
25 the following:

26 1. EWS was served with the Complaint through its registered agent on or around June 17,
27 2019 making its responsive pleading due on or around July 8, 2019.

28 2. The undersigned counsel for EWS was recently retained by EWS in connection with
29 this matter and is continuing to review the allegations asserted in the Complaint.

30 3. Due to the undersigned’s recent engagement, counsel was unable to request an
31 extension of time prior to the expiration of the original deadline to respond to the Complaint.

32 4. Counsel for Plaintiff has agreed to the requested extension and the requested extension

1 will not impact any other deadlines in this case.

2 5. This is the first request to extend the deadline for EWS to file its responsive pleading.

3 6. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive
4 pleading shall be extended through July 30, 2019.

5 Dated this 23rd day of July, 2019.

6 Respectfully Submitted,

7 By: /s/ Shane Clayton
8 Shane Clayton, Esq.
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By: /s/ Miles N. Clark
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11 David H. Krieger
12 HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
13 Henderson, NV 89123

14 IT IS SO ORDERED:
15 
16 UNITED STATES MAGISTRATE JUDGE

17 7-23-2019
18 DATED: _____
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July 2019, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which causes service upon all counsel registered thereon.

/s/ Shane Clayton